

MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN

A PROFESSIONAL CORPORATION

www.marshall dennhey.com

1220 N. Market St., 5th Floor, P.O. Box 8888 • Wilmington, DE 19899-8888
(302) 552-4300 • Fax (302) 651-7905

Direct Dial: 302-552-4302**Email: kjconnors@mdwcg.com**

December 15, 2006

PENNSYLVANIA
 Bethlehem
 Doylestown
 Erie
 Harrisburg
 King of Prussia
 Philadelphia
 Pittsburgh
 Scranton
 Williamsport

NEW JERSEY
 Cherry Hill
 Roseland

DELAWARE
 Wilmington

FLORIDA
 Fort Lauderdale
 Jacksonville
 Orlando
 Tampa

OHIO
 Akron



The Honorable Kent A. Jordan
 U.S. District Court
 Lock Box 10
 844 N. King Street, Room 4209
 Wilmington, DE 19801

RE: Crother v. Dewey Beach
 Our File No.: 13061-00368
 C.A. # 04-913

Dear Judge Jordan:

The undersigned attorney represents defendants and plaintiffs are represented by James Liguori, Esq. in the above referenced matter. I write on behalf of all the parties to request a brief extension of time for the filing of Dispositive and Daubert Motions from the current due date of Friday, December 22, 2006 to Monday, January 8, 2007. Counsel have pursued discovery in this case diligently, including paper discovery and the depositions of all parties, with the exception of one party, namely, defendant, John Wheatley. Mr. Wheatley is currently enrolled in the State Police Academy to become a State Trooper in the State of Maryland. The parties had planned to conduct his deposition this weekend, which is the only time that he is available given the rigorous scheduling requirements of the State Police Academy. Unfortunately, plaintiffs' attorney, Jim Liguori has been called to California this weekend to attend the funeral of a close friend. In addition, the parties wish to conclude settlement discussions in this case, which actually involves four (4) plaintiffs in three (3) separate incidents under one case caption. The parties do not seek a change in any other deadline or due date under the current Case Scheduling Order. The parties respectfully submit the enclosed Stipulation for Your Honor's approval.

On behalf of all parties, I thank Your Honor for consideration of this request.

Very truly yours,

/s/ Kevin J. Connors

Kevin J. Connors

KJC/vll
 Enclosure

cc: Clerk of the Court
 James E. Liguori, Esquire